City of Gardner, Kansas

Stormwater Management Plan

Federal Permit No. KSR410042

Submitted in Compliance with Kansas Permit No. M-MC51-SU01

Date: February 24, 2016

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Attachments

1.1 INTRODUCTION

This document is a Stormwater Management Plan (SMP, or the "Plan") created to help reduce the discharge of pollutants in stormwater runoff within regulated areas of Gardner, Kansas. It outlines stormwater program activities, monitoring requirements, reporting requirements, and responsible parties for implementing this work.

This plan was prepared in compliance with Kansas Permit Number: M-MC51-SU01

Effective Date: January 1, 2015

Expiration Date: December 31, 2019

Section 1.2 summarizes the basic requirements of the stormwater permitting program for the benefit of users of this document. Subsequent sections provide the details of the SMP itself.

1.2 OVERVIEW OF STORMWATER PERMIT REQUIREMENTS FOR MS4s

The Federal Water Pollution Control Act (also referred to as the Clean Water Act) requires permits of both municipal and industrial stormwater dischargers, developed under a program called the National Pollutant Discharge Elimination System (NPDES). Permits for stormwater discharges from municipal urbanized areas are regulated under the MS4 permitting program. The term MS4 is short for **M**unicipal **S**eparate **S**torm **S**ewer **S**ystems. (These are urbanized areas that have stormwater drainage systems that are separate from sanitary sewer systems.)

The Kansas Department of Health and Environment (KDHE) has developed two general MS4 permits for small municipalities with separate storm sewer systems. One was written for entities receiving an MS4 permit for the first time and another written for entities receiving a re-issued permit.

The general permits establish standardized requirements for entities across the state engaged in similar activities and discharging stormwater of similar quality. Permits issued to regulated cities or counties may include added conditions in addition to the standardized requirements in the general permits. The following description of the MS4 permit program was compiled from KDHE fact sheets:

> The small MS4 general permit program addresses MS4s that generally serve populations less than 100,000 in urbanized areas, plus those MS4s located outside of urbanized areas that have or may have the potential to negatively impact surface water quality as a result of their discharges.
>
> A general permit requires the permittee to develop, implement, and enforce a Stormwater Management Plan (SMP) designed to reduce the discharge of pollutants from the MS4 to the maximum extent practical, to protect water quality, and to satisfy water quality requirements of the Clean Water Act and Kansas law.
>
> The SMP must include six minimum stormwater control measures that are required of all plans. It is also required to address implementation of Best Management Practices (BMPs) for reducing pollutants in stormwater discharges from the municipality. Special emphasis is placed on drainage basins and stormwater pollutants that discharge to designated Total Maximum Daily Load (TMDL) streams and lakes within or immediately downstream of the municipality.
>
> The SMP document must address the BMPs to be implemented by the permittee, provide measurable goals for the BMPs, designate the parties responsible for implementing the control

measures, provide appropriate maps and conduct stormwater/receiving stream sampling and testing based upon the TMDL impairments.

"Impaired Waters" are streams or lakes that do not attain or maintain minimum water quality standards. They may result from individual or multiple pollutants. As noted above, TMDL is an acronym for **T**otal **M**aximum **D**aily **L**oad, which is a calculation of the maximum amount of a pollutant that a waterbody can receive and still meet water quality standards. Impaired streams and lakes are also commonly referred to as TMDL water bodies.

TMDL water bodies and pollutants of concern are identified in permits issued for individual municipalities if impaired waters exist within or immediately downstream of that jurisdiction. Monitoring requirements and water quality protection initiatives may then focus especially on those pollutants.

SECTION TWO Parties Responsible For Compliance With This Plan

The overall responsibility for compliance with this Plan is the Public Works Director. Implementation may include the following staff:

- City Engineer
- Business and Economic Development Director
- Staff Engineers
- Inspectors
- Communications Manager
- Parks & Recreation Director
- Utilities Director
- Johnson County Stormwater Management Program

This section describes the six minimum water quality protection control measures that are required by all MS4 permits. They include the following:

1. Public Education and Outreach
2. Public Involvement and Participation
3. Illicit Discharge Detection and Elimination
4. Construction Site Stormwater Runoff Control
5. Post-Construction Stormwater Management in New Development and Redevelopment
6. Pollution Prevention/Good Housekeeping for Municipal Operations

For each of these control measures the following is provided in this section:

- A summary description of the control measure
- The benefits of the control measure
- A table listing Best Management Practices (BMPs), Measurable goals for the BMPs, and Responsible parties
- Program assessment activities for evaluating the success of the control measure

3.1 CONTROL MEASURE 1 - PUBLIC EDUCATION AND OUTREACH

Description

This minimum control consists of implementing a public education program to inform individuals, businesses, and organizations about the impacts of stormwater discharges on surface water quality and how they can help reduce pollutants in stormwater runoff. This may include distribution of educational materials to the community and/or conducting outreach activities.

Benefit

An informed public increases awareness of water quality issues in both residents and businesses, creates opportunities for the public to take direct action to improve the health and sustainability of their community, and builds support for program goals making initiatives more effective.

BMPs, Goals, and Staff

Public Education and Outreach				
BMP	**BMP Description**	**Measurable Goal**	**Lead Staff**	**Schedule**
1.1 Develop a stormwater public education and outreach program	The City participates in education and outreach through partner efforts of the Johnson County Stormwater Management Program (JCSMP). Outreach efforts provided through this partnership may include partnering with schools and local non-profit organization working in Johnson County to implement stormwater education/curricula in schools and the community.	The program is in-place and educational and outreach programs available to the public. JCSMP provides annual summaries of initiatives, events, and number of participants. Those statistics will be included with the City's annual report.	City Engineer and Johnson County Stormwater Management Program (JCSMP) (Water Quality Specialist)*	Initiate program within 1 yr of effective date of permit (Jan 1, 2016) Continue annually, subject to Johnson County Stormwater Management Advisory Council (SMAC) funding
1.2 Develop stormwater related education and outreach materials	The City participates in the development of education materials through partner efforts of the JCSMP. Items provided through this partnership may include articles or advertising in local newspapers, print/electronic newsletters, flyers, brochures, envelope stuffers, etc.	The program is in-place and educational and outreach programs available to the public. JCSMP provides annual summaries of initiatives, events, and number of participants. Those statistics will be included with the City's annual report.	City Engineer and Johnson County Stormwater Management Program (JCSMP) (Water Quality Specialist)*	Annual, subject to SMAC funding
1.3 Annual Program Review	JCSMP and Cities review and assess the program on an annual basis, and revise as required.	As needed, note revisions in annual report and update SMP	City Engineer	Annual

*The city of Gardner is a member of the Johnson County Stormwater Management Council (SMAC) and as such partners with the Johnson County Stormwater Management Program (JCSMP) on various aspects of the six minimum controls measures. Many of the city's education and outreach efforts are accomplished through this partnership.

Program Assessment

The overall success of the Public Education and Outreach Program will be measured through the successful implementation of the components of the program. Johnson County plus the Mid-America Regional Council (MARC) Water Quality Education Committee provide annual summaries of program statistics for partner cities.

Program assessment will be reported with each annual NPDES report discussing the activities completed for the previous program year. Success will also be measured by the following:

- Number of education and outreach programs and presentations conducted, and attendance
- Number of publications produced and distributed
- Survey results, when conducted

3.2 CONTROL MEASURE 2 - PUBLIC INVOLVEMENT AND PARTICIPATION

Description

This minimum control consists of creating opportunities for individuals and organizations to provide public comment and recommendations regarding BMPs and measurable goals, and participate in the development and implementation of BMPs to reduce the contamination of stormwater. This program must also comply with state and local public notice requirements.

Benefit

The goal of the stormwater management plan is to improve water quality in local lakes and rivers, which provides benefits to the entire community. As such, the community deserves to have an opportunity to voice opinions on the content of the plan. Further, input into decisions builds support for and ownership in outcomes.

BMPs, Goals, and Staff

Public Involvement and Participation				
BMP	**BMP Description**	**Measurable Goal**	**Lead Staff**	**Schedule**
2.1 Develop a Public Involvement and Participation Program, and	Provide a mechanism for public comments on the stormwater management program, the SMP, and stormwater pollution control initiatives.	Program is started and a mechanism is in-place to solicit public input.	City Engineer	Initiate program within 1 yr of effective date of permit (Jan 1, 2016)
Create a Mechanism for Public Comment and Input	Input may be provided at City Hall, on website, at community events, or through similar means.	Develop a mechanism to accept comments, then create a log of comments and track responses		Provide public comment opportunities on an ongoing basis
2.2 Comply with Public Notice Provisions	Public comment methods will comply with State and City public notice requirements.	Revisions advertised, comments addressed	City Engineer	Annual
2.3 Promote Community Involvement	The City participates in community involvement initiatives through partner efforts of the Johnson County Stormwater Management Program (JCSMP).	List of stormwater related activities; summary of accomplishments; number of attendees is provided by JCSMP on an annual basis.	City Engineer, Parks and Recreation Director	Annual, subject to funding
2.5 Annual Program Review	Assess Program and revise as required	As needed, note revisions in annual report and update SMP	Public Works Director	Annual

Program Assessment

Similar to Public Education and Outreach, the overall success of the Public Involvement and Participation Program will be measured through the successful implementation of the components of the program. Program assessment will be reported with each annual NPDES report discussing the activities completed in this section for the previous program year. Success will also be measured specifically by the following:

- Number of public notices issued and comments received
- Number of community involvement events and participants

3.3 CONTROL MEASURE 3 - ILLICIT DISCHARGE DETECTION AND ELIMINATION

Description

This minimum control consists of developing, implementing, and enforcing a program to detect and eliminate illicit wastewater discharges or other non-stormwater discharges into the storm sewer system. KDHE requires this program to include, at a minimum:

- Developing a storm sewer system map of the permitted MS4 showing the location of all outfalls, either pipes or open channel drainage, and showing the names and locations of all streams or lakes that receive discharges from those outfalls.
- Enacting and enforcing an ordinance or resolutions to prohibit non-stormwater discharges into the storm sewer system.
- Informing public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste.
- Developing and implementing a plan to detect and address prohibited non-stormwater discharges.

Benefit

Direct discharges of waste streams can present significant localized impacts to both public health and the environment. Developing legal, technical, and educational means to eliminate illicit discharges provides direct benefits to water quality, the environment, and public health.

BMPs, Goals, and Staff

Illicit Discharge Detection and Elimination				
BMP	**BMP Description**	**Measurable Goal**	**Lead Staff**	**Schedule**
3.1 Map of Storm Sewer System	Prepare a map of the City's storm sewer system, pipes, channels, outfalls, and receiving water bodies.	Map is complete.	GIS Analyst	Prepare in 2015 Complete by Dec 31, 2015
3.2 Develop an Illicit Discharge Detection and Elimination program	Initiate a program to detect and eliminate illicit discharges incorporating the elements below.	Program is initiated, mapping is complete, and ordinance is in-place.	City Engineer	Initiate program within 2 yrs of effective date of permit (Jan 1, 2017)
3.3 Pollution Prevention Ordinance	Develop or update the Stormwater Pollution Ordinance and enforcement procedures as needed	Ordinance prepared or updated (if required)	City Engineer	Jan 1, 2017
3.4 Program to inform public employees, businesses, and general public	Incorporate information on the hazards of illegal discharges into the public education and outreach program.	Education materials include illicit discharge information.	City Engineer	Jan 1, 2017

Illicit Discharge Detection and Elimination				
BMP	**BMP Description**	**Measurable Goal**	**Lead Staff**	**Schedule**
	Train city employees in key departments on the hazards of illicit discharges and how to identify them.	Train appropriate staff in Planning/Codes, Facilities, Public Works, and Parks and Recreation, etc. annually on reporting pollution or conducting inspections.	City Engineer	Annually beginning in 2017.
3.5 Implement a plan to detect and address illicit discharges	Provide a means for residents to report illicit discharges. Respond to and investigate reports of potential illicit discharges.	Investigate illicit discharge complaints in the City, track the number of complaints received, and the disposition of the problem found. Forward complaints to appropriate agencies, as needed.	City Engineer	Annually beginning in 2017.
3.6 Annual Program Review	Assess the Program and revise as required	As needed, note revisions in annual report and update SMP	Public Works Director	Annual

Program Assessment

The overall success of the Illicit Discharge Detection and Elimination Program will be measured through the successful implementation and enforcement of a Stormwater Pollution Ordinance.

Program assessment will be reported with each annual NPDES report discussing the activities completed in this section for the previous program year. Success will also be measured by the following:

- Number of public complaints addressed or problems discovered by City staff
- Number of inspections conducted
- Number of notices of violation or penalties issued

3.4 CONTROL MEASURE 4 - CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

Description

This minimum control includes developing, implementing, and enforcing a program to reduce pollutants in any stormwater runoff to the MS4 for construction sites disturbing one acre or more, including areas that are less than one acre but are part of a larger common plan for development that disturbs one or more acre. KDHE requires this program to include:

- Where permittees have the authority to do so, ordinances or resolutions shall be enacted to require erosion and sediment controls, as well as sanctions to ensure compliance.
- Requirements for construction site owners or operators to implement erosion and sediment control BMPs.
- Requirements for construction site owners or operators to control wastes at the construction site that are likely to cause adverse impacts to water quality.
- Procedures for site plan review which incorporate consideration of potential water quality impacts.
- Procedures for receipt and consideration of information submitted by the public.
- Procedures for site inspection and enforcement of control measures.

Benefit

If uncontrolled, land disturbance activities can generate significant loads of sediment which can impact both adjoining properties and downstream water bodies. Fortunately, effective controls are easy and cost-effective to implement.

BMPs, Goals, and Staff

Construction Site Stormwater Runoff Control				
BMP	**BMP Description**	**Measurable Goal**	**Lead Staff**	**Schedule**
4.1 Regulations and Standards	Develop or update an Erosion and Sediment Control Ordinance.	Ordinance is in-place.	City Engineer	Initiate program within 3 yrs of effective date of permit (Jan 1, 2018)
4.2 Site Plan Review	Require an Erosion and Sediment Control Plan for any land disturbance activity equal to one acre or more, to address erosion & sediment control, and water quality protections.	Review all erosion and sediment control plans.	Staff Engineer	Process in-place by Jan 1, 2018 Then track as-needed
	Require submittal of state NOI for Stormwater Construction Runoff.	Request copy of NOI and place in project file.	Staff Engineer	As-needed

Construction Site Stormwater Runoff Control				
BMP	**BMP Description**	**Measurable Goal**	**Lead Staff**	**Schedule**
4.3 Site Inspection and Enforcement	Track construction site inspections, complaints, violations, and enforcement measures	Number of inspections, complaints, violations, enforcement measures	Inspectors	Start inspection program by Jan 1, 2018 Track as-needed
4.4 Receipt of Public Information on Construction Site Compliance	Provide a procedure to receive and consider information from the public.	Summary of information received and actions taken.	Staff Engineer	Start process by Jan 1, 2018 Track as-needed
4.5 Staff Training	Provide training to plan review and inspection staff.	Track training opportunities and total number of participants.	City Engineer	Start training by Jan 1, 2018 Track annually
4.6 Annual Program Review	Assess the Program and revise as required	As needed, note revisions in annual report and update SMP	Public Works Director	Annual

Program Assessment

The overall success of the Construction Site Stormwater Runoff Control Program will be measured through the successful implementation and enforcement of the Erosion and Sedimentation Control Ordinance. Program assessment will be reported with each annual NPDES report discussing the activities completed in this section for the previous program year. Success will also be measured by the:

- Number of plans reviewed
- Number of inspections conducted
- Number of NOVs issued
- Number and amount of penalties issued

3.5 CONTROL MEASURE 5 - POST-CONSTRUCTION STORMWATER MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT

Description

This minimum control requires the development, implementation, and enforcement of a program to address post-construction stormwater runoff controls from both new development and redevelopment sites after development sites disturbing one acre or more, including projects that are less than one acre but are part of a larger common plan for development that disturbs one or more acre. KDHE requires the program to include:

- For permitees which have the authority, ordinances or resolutions to address post-construction runoff from new development and redevelopment projects to the extent allowable under state and local law.
- BMPs to prevent or minimize adverse water quality impacts.
- Strategies which include a combination of structural and/or non-structural BMPs appropriate for the municipality.
- Means to ensure adequate long-term operation and maintenance of BMPs.

Benefit

Conversion of native landscape to developed landscape increases both the volume of stormwater runoff and pollutant loads in stormwater. The consequences can include erosion, flooding, and pollution, impacting both downstream property owners and public infrastructure. Stormwater controls included in development sites can help reduce impacts and costs to both private property owners and the public.

BMPs, Goals, and Staff

Post-Construction Stormwater Management in New Development and Redevelopment				
BMP	**BMP Description**	**Measurable Goal**	**Lead Staff**	**Schedule**
5.1 Regulations and Standards	Develop or update Post Construction Stormwater Management Ordinance.	Ordinance is in-place.	City Engineer	Initiate program within 3 yrs of effective date of permit (Jan 1, 2018)
5.2 Site Plan Review	Require a Post-Construction Stormwater Management Plan for any new development or re-development project that disturbs one acre or more of land.	Review all plans to determine compliance with Post-Construction Stormwater Management Ordinance and design criteria.	Staff Engineer	Process in-place by Jan 1, 2018. Review plans as-needed
5.3 Site Inspection and Enforcement	Establish inspection program for private and public projects.	Implement inspection program.	City Engineer	Jan 1, 2018
5.4 Establish long term O&M Program	Establish a program that requires the owner/operator to perform routine inspections and long-term maintenance.	Develop appropriate ordinance and program requirements.	City Engineer	Jan 1, 2018

Post-Construction Stormwater Management in New Development and Redevelopment				
BMP	**BMP Description**	**Measurable Goal**	**Lead Staff**	**Schedule**
5.5 Annual Program Review	Assess Program and revise as required	As needed, note revisions in annual report and update SMP	Public Works Director	Annual

Program Assessment

The overall success of the Post-Construction Stormwater Management Program will be measured through the successful implementation and enforcement of a Post-Construction Stormwater Management Ordinance. Program assessment will be reported with each annual NPDES report discussing the activities completed in this section for the previous program year. Success will also be measured by the following:

- Number of plans reviewed
- Ordinances updated and procedures enacted

3.6 CONTROL MEASURE 6 - POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

Description

This minimum control measure requires the development and implementation of an operation and maintenance and training program to reduce and prevent stormwater pollution from public facility operations such as park and open space maintenance, fleet and building maintenance, new construction and land disturbance, and stormwater system maintenance.

Benefit

Leading by example on public facilities and projects provides an opportunity to demonstrate and teach proper techniques to other landowners, and it is available on a routine and ongoing basis.

BMPs, Goals, and Staff

Pollution Prevention/Good Housekeeping for Municipal Operations				
BMP	**BMP Description**	**Measurable Goal**	**Lead Staff**	**Schedule**
6.1 Implement practices to reduce pollution from the O&M of city facilities.	Stormwater pollution inspections.	Inventory, inspect and assess city facilities for potential water quality effects. After initial inventory, conduct annual inspections.	Public Works Director	Initiate program within 2 yrs of effective date of permit (Jan 1, 2017) Then annual Inspections
	Design a pollution reduction plan for city facilities and operations such vehicle maintenance and storage, park and building maintenance operations, toxic materials handling and transfer, vehicle fueling stations, and snow and ice removal and lawn care operations.	Prepare and implement a Stormwater Pollution Prevention Plan for these operations.	Public Works Director	Jan 1, 2017
6.3 Conduct staff training.	Design educational sessions to ensure staff is proficient in minimizing stormwater pollution from daily operations.	Organize annual training sessions for staff involved with operations and maintenance.	Public Works Director	Annual beginning in 2017
6.4 Annual Program Review	Assess Program and revise as required	As needed, note revisions in annual report and update SMP	Public Works Director	Annual

Program Assessment

The overall success of the Pollution Prevention/Good Housekeeping Program will be measured through the successful implementation of facility SWPPPs, employee training and facility inspections conducted as part of the program. Program assessment will be reported with each annual NPDES report discussing the activities completed in this section for the previous program year. In addition, success will also be measured by:

- The number of inspections conducted
- The number of problems discovered and resolved
- Training classes conducted

TMDL Pollutants

The most common TMDL pollutants in Johnson County watersheds, in general, include bacteria, nutrients, and sediment. Consequently, the BMPs described below emphasize the control of those pollutants.

TMDL regulated pollutants and impaired streams identified in the city of Gardner's permit are listed below:

	TMDL Regulated Pollutant		
Impaired Stream	**Bacteria**	**Nutrients**	**Sediment**
Kill Creek	Yes	Yes	Yes

Best Management Practices (BMPs)

All six of the minimum control measures are designed to reduce pollutants in stormwater runoff. Those BMPs especially targeting bacteria, nutrients, and sediment, the most common TMDL pollutants in urbanized Johnson County, include the following:

Bacteria

- Public Education and Outreach, such as pet waste pickup campaigns
- Illicit Discharge Detection and Elimination Program
- Post-Construction Runoff Controls requiring the implementation of post-construction BMPs

Nutrients

- Public Education and Outreach: Programs conducted by Johnson County Stormwater Management Program on behalf of the cities include the Water Quality Education Grant Program; Homeowner BMP Cost Share Program; K-State Extension Water Quality Partnership
- Post-Construction Runoff Controls requiring the implementation of post-construction BMPs

Sediment

- Erosion & Sediment Control at Construction Sites: Permitting and inspection program
- Post- Construction Runoff Controls requiring the implementation of post-construction BMPs

Pollutant Reduction Goals

Success in achieving reductions in bacteria, nutrients, and sediment will be assessed by directly monitoring in-stream concentrations and evaluating pollutant concentration trends across the permit period. The monitoring program is being conducted by the Johnson County Stormwater Management Program on behalf of the cities in the county.

Mapping

A map of the permit area is included as Attachment 1.

SECTION FIVE Monitoring

An in-stream monitoring program targeting impaired streams and TMDL pollutants throughout Johnson County is being undertaken by the Johnson County Stormwater Management Program in conjunction with the USGS Cooperative Water Program. This program is being conducted on behalf of the cities in the county. Annual results of the monitoring program will be provided to the cities as well as the KDHE.

The monitoring program will include:

1. A network of 25 sites where discrete samples will be collected with passive samplers. Sample locations are located where streams generally enter and leave jurisdictional boundaries in impaired watersheds.
2. Targeted analytes include nutrients, suspended sediment, and *Escherichia coli* bacteria.
3. Four samples will be collected at each site annually (environmental conditions permitting, with a minimum of two samples collected in calendar year 2014).
4. Samples will be collected from storm events of at least 0.5 inches in 24-hours and samples will be collected during the rising limb of the storm events.
5. USGS is also including additional sampling techniques and added parameters at selected locations to help assess the effectiveness of the overall monitoring program.
6. Data will be compiled and reviewed on a routine basis and an annual summary of results provided.

Permit Compliance Schedule

Part IV of the 2014 permit includes the following compliance schedule requirements.

- **February 28, 2016:** Submit a copy of this SMP to KDHE.
- **February 28 of each year:** Submit an annual report for the preceding calendar year to KDHE.
- **Year 2015**: Complete inventory and maps of outfalls, streams, and lakes in TMDL targeted areas; drainage basins for structural and non-structural BMPs; Select and initiate or continue effective plans for source control programs targeted to TMDL pollutants.
- **Year 2016**: Continue BMP implementation and source control programs.
- **July 1, 2016**: Implement the initial stormwater monitoring program, as appropriate.
- **Year 2017:** Continue BMP implementation, source control programs, and monitoring program.
- **Year 2018**: Continue BMP implementation, source control programs, and monitoring program.
- **February 28, 2019**: Provide a final report on the effectiveness of source controls and selected BMPs to achieve the measurable goals and summarize water quality data from selected sites.

Annual Reporting

A calendar year annual report will be submitted to KDHE by February 28 of each year. The report will cover activities conducted during the prior calendar year and will include the following:

- Summary of compliance activities associated with the permit
- A review of the appropriateness of BMPs and progress towards achieving water quality goals
- Results of information collected and analyzed, if any, including monitoring data
- Summary and status of stormwater activities conducted during the previous year
- Summary of stormwater activities scheduled to take place during next reporting cycle (including schedule)
- Map showing changes in jurisdictional permit area, if appropriate
- Description of significant changes in any BMPs, including the six minimum control measures
- Copies of updated ordinances or resolutions associated with this SMP or the six minimum control measures
- Updated list of other parties which will be responsible for implementing program areas of this SMP, if any

SECTION SEVEN Modifications to BMPs or this Plan

This SMP will be evaluated annually and modifications to the Plan, if any, will be submitted with the annual report.

Minor modifications to BMPs listed in this plan, if needed to meet program objectives, will be made within 60 days determination by the permittee or written notification from KDHE.

Major modifications to BMPs listed in this plan, if needed to meet program objectives, will be proposed in a written plan to KDHE, within 60 days determination by the permittee or written notification from KDHE.

Attachments – Maps